

# Exhibit R

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**From:** Joseph Saltiel  
**Sent:** Friday, May 26, 2023 4:26 PM  
**To:** Arthur Wellman; Eugene Hahm; Nick Woloszczuk  
**Cc:** Alex Bennett; Barry Irwin; BShelton@winston.com  
**Subject:** RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

**Attachments:** Redline of Second Amended Final Invalidity Contentions.pdf; Defendant's motion for leave to serve second amended final invalidity contentions.docx; Proposed Order Granting Defendant Leave to Serve Second Amended Final Invalidity Contentions.docx

Arthur,

To follow up on our discussion from Tuesday, we are attaching a redline of the second amended invalidity contentions showing changes from the amended invalidity contentions that we served in December. Also attached are a draft motion for leave and a proposed order.

Please let us know if Repairify agrees to submit this motion unopposed.

Thank you,

Joe Saltiel  
Irwin IP LLP

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312-667-6283 – office  
630-841-0512 – mobile

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**From:** Arthur Wellman <[AWellman@prangerlaw.com](mailto:AWellman@prangerlaw.com)>  
**Sent:** Friday, May 19, 2023 5:16 PM  
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**Cc:** Alex Bennett <[abennett@irwinip.com](mailto:abennett@irwinip.com)>; Barry Irwin <[birwin@irwinip.com](mailto:birwin@irwinip.com)>; BShelton@winston.com  
**Subject:** RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

//EXTERNAL//  
Hi, Joe,

Thank you very much for that; I think we can speak and see whether we can submit unopposed. I look forward to speaking with you,  
Arthur

Arthur A. Wellman, Jr.  
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**Cc:** Alex Bennett <[abennett@irwinip.com](mailto:abennett@irwinip.com)>; Barry Irwin <[birwin@irwinip.com](mailto:birwin@irwinip.com)>; [BShelton@winston.com](mailto:BShelton@winston.com)  
**Subject:** RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

[CAUTION: EXTERNAL EMAIL]

Arthur,

We do not intend to add new invalidity positions. Instead, we plan to amend our invalidity contentions to identify factual allegations that support our existing 112 allegations from recently produced discovery in this matter.

If you would like to discuss further, Tuesday at 12 pm PT / 2 pm CT would work for us.

Thank you,

Joe Saltiel  
Irwin IP LLP

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**From:** Arthur Wellman <[AWellman@prangerlaw.com](mailto:AWellman@prangerlaw.com)>  
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**Subject:** RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

//EXTERNAL//

Hi, Joe,

Thank you for this. We can be available Monday at 2 p.m. or thereafter, or Tuesday after 10 a.m. to 1 p.m. And again 2 p.m. and thereafter. All times PDT. Please let me know if something in there works for you all.

In the interim, if you want to send us something regarding the how and why, that might obviate a need to meet and confer and/or focus it. Of, of course, you can just raise it when we talk.

Please let me know. Thank you and have a pleasant weekend,  
Arthur

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**From:** Joseph Saltiel <[jsaltiel@irwinip.com](mailto:jsaltiel@irwinip.com)>  
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**Subject:** Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

[CAUTION: EXTERNAL EMAIL]

Counsel,

We are planning to file a motion to request leave to amend our invalidity contentions. Please let us know when you are available to meet and confer to discuss.

Best regards,

Joe Saltiel

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Intellectual Property Litigation  
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